

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

PHILIP RAYMOND,

Defendant

) Criminal No. 20cr10222

) Violations:

) Counts One through Thirteen:

) Sexual Exploitation of Children, and Attempt
) (18 U.S.C. §§ 2251(a) and (e))

) Forfeiture Allegation:

) (18 U.S.C. § 2253)
)

INDICTMENT

COUNT ONE

Sexual Exploitation of Children, and Attempt
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury charges:

On various dates between in or about 2004 and in or about 2008, in the District of Massachusetts and elsewhere, the defendant,

PHILIP RAYMOND,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, "Minor A (YOB 1994)," to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO

Sexual Exploitation of Children, and Attempt
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates between in or about 2005 and in or about 2011, in the District of Massachusetts, the defendant,

PHILIP RAYMOND,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor B (YOB 2001),” to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT THREE

Sexual Exploitation of Children, and Attempt
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates between in or about 2010 and in or about 2014, in the District of Massachusetts, the defendant,

PHILIP RAYMOND,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor C (YOB 2004),” to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT FOUR
Sexual Exploitation of Children, and Attempt
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates between in or about 2009 and in or about 2011, in the District of Massachusetts, the defendant,

PHILIP RAYMOND,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor D (YOB 2003),” to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT FIVE

Sexual Exploitation of Children, and Attempt
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates between in or about 2008 and in or about 2010, in the District of Massachusetts, the defendant,

PHILIP RAYMOND,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor E (YOB 1999),” to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT SIX

Sexual Exploitation of Children, and Attempt
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates in or about 2009, in the District of Massachusetts, the defendant,

PHILIP RAYMOND,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor F (YOB 2001),” to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT SEVEN

Sexual Exploitation of Children, and Attempt
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates in or about 2009, in the District of Massachusetts, the defendant,

PHILIP RAYMOND,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor G (YOB 2000),” to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT EIGHT

Sexual Exploitation of Children, and Attempt
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates between in or about 2008 and in or about 2010, in the District of Massachusetts, the defendant,

PHILIP RAYMOND,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor H (YOB 2001),” to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT NINE

Sexual Exploitation of Children, and Attempt
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates in or about March 2010, in the District of Massachusetts, the defendant,

PHILIP RAYMOND,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor I (YOB 2001),”
to engage in any sexually explicit conduct for the purpose of producing any visual depiction of
such conduct and the visual depiction was produced and transmitted using materials that had been
mailed, shipped, and transported in and affecting interstate and foreign commerce by any means,
including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TEN

Sexual Exploitation of Children, and Attempt
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates between in or about 2009 and in or about 2010, in the District of Massachusetts, the defendant,

PHILIP RAYMOND,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor K (YOB 1999),” to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT ELEVEN

Sexual Exploitation of Children, and Attempt
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates in or about October 2009, in the District of Massachusetts, the defendant,

PHILIP RAYMOND,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor M (YOB 2003),”
to engage in any sexually explicit conduct for the purpose of producing any visual depiction of
such conduct and the visual depiction was produced and transmitted using materials that had been
mailed, shipped, and transported in and affecting interstate and foreign commerce by any means,
including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWELVE

Sexual Exploitation of Children, and Attempt
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

In or about November 2010, in the District of Massachusetts, the defendant,

PHILIP RAYMOND,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor N (YOB 2001),” to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT THIRTEEN
Sexual Exploitation of Children, and Attempt
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

In or about June 2010, in the District of Massachusetts, the defendant,

PHILIP RAYMOND,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor O (YOB 2001),” to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

CHILD PORNOGRAPHY FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

1. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 2251(a) and (e), set forth in Counts One through Thirteen of this Indictment, the defendant,

PHILIP RAYMOND,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant--

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Sections 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL


FOREPERSON



ANNE PARUTI
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: October 1, 2020
Returned into the District Court by the Grand Jurors and filed.

/s/ Harold Putnam Date: 10/1/2020; Time: 4:09 p.m.

DEPUTY CLERK